Change at clinics request

Objector	Group of Chattanooga	St. Thomas Outpatient Neurosurgical Center	Specialty Surgery Center, PLLC	Howell Allen Clinic, PLLC	Dr. Donald Jones	Southeast Michigan Surgial Hospital	Michigan Pain Specialists		Baltimore Pain Management Center	North Carolina Orthopedic Clinic	Surgical Park Center, Ltd.	Surgery Center of Wilson, LLC	Forsyth Street Ambulatory Surgery Center, LLC
Docket Entry #	218 & 307	219 & 305	220 & 308	221 & 304	222 & 306	236, 289 & 356	241 & 347	244	254	259	261	275 & 318	279 & 361
State	TN	TN	TN	TN	TN	MI	МІ	IL	MD	NC	FL	NC	GA
I. BURDEN (i.e., time, expense, and scope) OBJECTIONS													
A. The request for production of documents is overly broad, not narrowly tailored, and unduly burdensome.	Х	х	Х	х	Х	х	х	Х	Х		Х	Х	х
B. The time periods for which documents are requested are unreasonable.	х	х	Х	х	Х	Х	Х	Х	х		х		
C. The subpoena calls for the production of documents properly attainable by plaintiffs from public sources (e.g. CDC, FDA).	х	х	х	х	х				х		х	х	
D. Many of the documents sought by the subpoena are more appropiatly sought from NECC, thus reducing the burden and expense on the clinics.	х	х	х	х	Х				х			х	

Change at clinics request

Objector		0 ,	Pain Associates of Charleston	Dr. O'Connell's Pain Care Center	Surgery Center		Ukiah Valley Medical Center	Interventional Spine & Sports Medicine, PC		Harford County Ambulatory Surgery Center, LLC	Pain Management,	Sahara Outpatient Surgery Center, Ltd.
Docket Entry #	288 & 348	314, 358, 359 & 360	372	311 & 353	303	317 & 355	Not electronically filed	345 & 354	338 & 339	342	334	368
State	MI	NY	SC	NH	MD	FL	CA	СТ	CA	MD	PA	NV
I. BURDEN (i.e., time, expense, and scope) OBJECTIONS												
A. The request for production of documents is overly broad, not narrowly tailored, and unduly burdensome.	х	х	х	х		х	Х	х	Х		х	х
B. The time periods for which documents are requested are unreasonable.		Х	Х			Х		х				Х
C. The subpoena calls for the production of documents properly attainable by plaintiffs from public sources (e.g. CDC, FDA).		х	х	х		х		х			х	х
D. Many of the documents sought by the subpoena are more appropiatly sought from NECC, thus reducing the burden and expense on the clinics.		х	х			х		х				х

	Universal Pain	Pain Medicine	Medical	Union Hospital	Ambulatory	Sequoia Surgery	Edison	Isaiah	Comprehensiv	Box Hill	The South
	Management	Specialists, PA	Advanced		Surgery Center		Surgical (in	Florence (in	e Pain	Surgery	Bend Clinic,
	Medical		Pain		Junger y Jerrice.	f/k/a Cypress	discussions	discussions	Management	Center	LLC
Objector	Corporation		Specialists,			Surgery Center,	w/Steve	w/Steve	(in discussions		
	d/b/a Universal		P.A. ("MAPS")			LLC	Rasnick)	Rasnick)	` w/Steve		
	Pain		, ,				,	,	Rasnick		
	Management										
Docket Entry			Not			Not	Non-	Non-	Non-	Non-	
#	383	400 & 405	electronically	Non-	Non-	electronically	Responsive	Responsive	Responsive	Responsive	
<u>"</u>			filed	Responsive	Responsive	filed	певропоте	пеорополе	espensive		269 & 270
State	CA	MD	MN	IN	IN		NJ	NJ	NJ	MD	IN
State	CA	IVID	IVIIN	IIN	IIN		INJ	INJ	INJ	טועו	IIN
I. BURDEN (i.e., time, expense, and scope)											
OBJECTIONS											
A. The request for production of documents is											
overly broad, not narrowly tailored, and unduly		X								Х	Х
burdensome.											
B. The time periods for which documents are											
requested are unreasonable.											
C. The subpoena calls for the production of											
documents properly attainable by plaintiffs from											
public sources (e.g. CDC, FDA).		Х								Х	
D. Many of the documents sought by the											
subpoena are more appropiatly sought from											
NECC, thus reducing the burden and expense on		X								Х	
the clinics.											
	I			ĺ	ĺ	ĺ	l		1		l

Objector	Neurosurgical Group of Chattanooga	St. Thomas Outpatient Neurosurgical Center	Specialty Surgery Center, PLLC	Howell Allen Clinic, PLLC	Dr. Donald Jones	Southeast Michigan Surgial Hospital	1 -	Thorek Memorial Hospital	Baltimore Pain Management Center	North Carolina Orthopedic Clinic	Surgical Park Center, Ltd.	Surgery Center of Wilson, LLC	Forsyth Street Ambulatory Surgery Center, LLC
II. JURISDICTIONAL AND PROCEDURAL OBJECTIONS													
E. This court does not have jurisdiction to issue and/or enforce the subpoena.								х					
F. The clinic is not a party to any litigation and/or has no injured patients, and exceeds the proper scope of discovery from a non-party.	х				х	х	х		х		х	х	х
G. The subpoena imposes burdens other than or beyond those imposed by the Order on Central Enforcement and the Qualified Protected Order.		х	х	х	Х	х	х		х	х	х	х	х
H. The subpoena calls for the production of documents protected from disclosure as reflective of attorney-client communications and/or attorney work product.	х	х	х	х	х	х	х	х	х		х	х	
I. The PSC failed to provide the fee for one day's attendance as required by Rule 45(b)(1).	X (Remove)	X (Remove)	X (Remove)	X (Remove)	X (Remove)	х	х	х		х	х	х	х
J. Clinics that are parties should have been served a request for production pursuant to Rule 34 rather than a subpoena pursuant to Rule 45.	d	х	х	Х									
K. The subpoena was improperly served via Federal Express or Certified Mail. L. The subpoena calls for the production of documents outside the clinic's possession, custody or control.						х	х		х		х	х	

Objector	Neuromuscular and Rehabilitation Associates of Northern Michigan	J ,	Pain Associates of Charleston	Dr. O'Connell's Pain Care Center	Surgery Center		Ukiah Valley Medical Center	Interventional Spine & Sports Medicine, PC		Harford County Ambulatory Surgery Center, LLC	Allegheny Pain Management, P.C.	Sahara Outpatient Surgery Center, Ltd.
II. JURISDICTIONAL AND PROCEDURAL OBJECTIONS												
E. This court does not have jurisdiction to issue and/or enforce the subpoena.		х	х	х				х	х		х	
F. The clinic is not a party to any litigation and/or has no injured patients, and exceeds the proper scope of discovery from a non-party.	х	Х		х		Х	Х	х			х	Х
G. The subpoena imposes burdens other than or beyond those imposed by the Order on Central Enforcement and the Qualified Protected Order.	х	х	х	х	х	х		х	х		х	x
H. The subpoena calls for the production of documents protected from disclosure as reflective of attorney-client communications and/or attorney work product.	х	х	х	Х			Х	х			х	Х
I. The PSC failed to provide the fee for one day's attendance as required by Rule 45(b)(1).		х	Х		х	Х		Х			Х	
J. Clinics that are parties should have been served a request for production pursuant to Rule 34 rather than a subpoena pursuant to Rule 45.												
K. The subpoena was improperly served via Federal Express or Certified Mail. L. The subpoena calls for the production of documents outside the clinic's possession, custody or control.	Х	Х	x x	Х	Х	X		x x			Х	Х

Objector	Universal Pain Management Medical Corporation	Pain Medicine Specialists, PA	Medical Advanced Pain Specialists,	Union Hospital	Ambulatory Surgery Center	Sequoia Surgery Center, LLC f/k/a Cypress Surgery Center,	Edison Surgical (in discussions w/Steve	Isaiah Florence (in discussions w/Steve	Comprehensiv e Pain Management (in discussions	Box Hill Surgery Center	The South Bend Clinic, LLC
	d/b/a Universal Pain Management		P.A. ("MAPS")			LLC	Rasnick)	Rasnick)	w/Steve Rasnick		
II. JURISDICTIONAL AND PROCEDURAL OBJECTIONS											
E. This court does not have jurisdiction to issue and/or enforce the subpoena.		х				х				Х	
F. The clinic is not a party to any litigation and/or has no injured patients, and exceeds the proper scope of discovery from a non-party.		х				х				х	
G. The subpoena imposes burdens other than or beyond those imposed by the Order on Central Enforcement and the Qualified Protected Order.		х								x	х
H. The subpoena calls for the production of documents protected from disclosure as reflective of attorney-client communications and/or attorney work product.			х								
I. The PSC failed to provide the fee for one day's attendance as required by Rule 45(b)(1).	х		х							X	х
J. Clinics that are parties should have been served a request for production pursuant to Rule 34 rather than a subpoena pursuant to Rule 45.											
K. The subpoena was improperly served via Federal Express or Certified Mail.	Х	х								Х	
L. The subpoena calls for the production of documents outside the clinic's possession, custody or control.		Х								Х	

Change at clinics request

	Group of Chattanooga	St. Thomas Outpatient Neurosurgical Center	Surgery Center, PLLC	Howell Allen Clinic, PLLC	Jones	Michigan Pain Specialists	Thorek Memorial Hospital	Baltimore Pain Management Center		_	Wilson, LLC	Forsyth Street Ambulatory Surgery Center, LLC
M. The subpoena provided only 21 or 30 days to respond, which is not a reasonable amount of time.	х	х	х	х	Х	х			х		Х	
N. Rule 45(b)(1) requires that subpoenas be served on each party to the MDL. Comments to the Rule say that parties should have given notice before service of the subpoenas on third parties.	^	х	х	х	х							х

Change at clinics request

	Neuromuscular and	Rochester Brain and Spine	Pain	Dr. O'Connell's	Greenspring	Pain	Ukiah Valley	Interventional	Encino	Harford	Allegheny	Sahara
	Rehabilitation	Neurosurgery & Pain	Associates of	Pain Care	Surgery Center	Consultants of	Medical Center	Spine & Sports	Outpatient	County	Pain	Outpatient
	Associates of Northern		Charleston	Center		West Florida		Medicine, PC	Surgery Center,	Ambulatory	Management,	Surgery
Objector	Michigan									Surgery Center, LLC	P.C.	Center, Ltd.
M. The subpoena provided only 21 or 30 days to												
respond, which is not a reasonable amount of	Х	Х	Х	Х		Х		Х	Х		Х	Х
time.												
N. Rule 45(b)(1) requires that subpoenas be												
served on each party to the MDL. Comments to												
the Rule say that parties should have given notice	Х								Х			
before service of the subpoenas on third parties.												

Change at clinics request

	Universal Pain	Pain Medicine	Medical	Union Hospital	Ambulatory	Sequoia Surgery	Edison	Isaiah	Comprehensiv	Box Hill	The South
	Management	Specialists, PA	Advanced		Surgery Center	Center, LLC	Surgical (in	Florence (in	e Pain	Surgery	Bend Clinic,
	Medical		Pain			f/k/a Cypress	discussions	discussions	Management	Center	LLC
Objector	Corporation		Specialists,			Surgery Center,	w/Steve	w/Steve	(in discussions		
	d/b/a Universal		P.A. ("MAPS")			LLC	Rasnick)	Rasnick)	w/Steve		
	Pain								Rasnick		
	Management										
M. The subpoena provided only 21 or 30 days to											
respond, which is not a reasonable amount of			Х								
time.											
N. Rule 45(b)(1) requires that subpoenas be											
served on each party to the MDL. Comments to											
the Rule say that parties should have given notice	х										
before service of the subpoenas on third parties.	^										

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Change at clinics request

Objector	Group of Chattanooga	St. Thomas Outpatient Neurosurgical Center	Specialty Surgery Center, PLLC	Howell Allen Clinic, PLLC	Dr. Donald Jones	Southeast Michigan Surgial Hospital	Michigan Pain Specialists	Thorek Memorial Hospital	Baltimore Pain Management Center	North Carolina Orthopedic Clinic	_	Wilson, LLC	Forsyth Street Ambulatory Surgery Center, LLC
III. CONFIDENTIALITY OBJECTIONS													
O. The subpoena calls for the production of confidential or proprietary business information.	X (Remove)	х	х	Х	X (Remove)		X	х	х		Х	х	х
P. The subpoena calls for the production of documents protected from disclosure under the state doctor-patient privilege, and/or the production of which would violate the requirements of HIPAA and its related regulations.	Х	х	Х	X	Х	х	x	х	X		Х	Х	х

Change at clinics request

Objector	Neuromuscular and Rehabilitation Associates of Northern Michigan	· ,	Pain Associates of Charleston	Dr. O'Connell's Pain Care Center	Surgery Center		Ukiah Valley Medical Center		Outpatient Surgery Center,	Ambulatory	Allegheny Pain Management, P.C.	Sahara Outpatient Surgery Center, Ltd.
III. CONFIDENTIALITY OBJECTIONS												
O. The subpoena calls for the production of confidential or proprietary business information.	х	х	х	х	х		Х	х				х
P. The subpoena calls for the production of documents protected from disclosure under the state doctor-patient privilege, and/or the production of which would violate the requirements of HIPAA and its related regulations.	х	х	х	х	х	х	х	х	х		х	х

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Change at clinics request

Objector		Pain Medicine Specialists, PA	Medical Advanced Pain Specialists, P.A. ("MAPS")	Ambulatory Surgery Center	Sequoia Surgery Center, LLC f/k/a Cypress Surgery Center, LLC	Edison Surgical (in discussions w/Steve Rasnick)	Isaiah Florence (in discussions w/Steve Rasnick)	Comprehensiv e Pain Management (in discussions w/Steve Rasnick	Box Hill Surgery Center	The South Bend Clinic, LLC
III. CONFIDENTIALITY OBJECTIONS										
O. The subpoena calls for the production of confidential or proprietary business information.	х	Х							X	
P. The subpoena calls for the production of documents protected from disclosure under the state doctor-patient privilege, and/or the production of which would violate the requirements of HIPAA and its related regulations.	х	x	×		x				X	х

Change at clinics request

Objector	_	Outpatient	Surgery Center, PLLC	Howell Allen Clinic, PLLC	Jones			Memorial	Management	North Carolina Orthopedic Clinic	-	•	Forsyth Street Ambulatory Surgery Center, LLC
IV. MOTIVE OBJECTIONS													
Q. The PSC's subpoenas are thinly-veiled attempts to identify new clients.	х	Х	Х	Х	Х	Х	Х		х		х	х	Х

Change at clinics request

	Neuromuscular and	Rochester Brain and Spine	Pain	Dr. O'Connell's	Greenspring	Pain	Ukiah Valley	Interventional	Encino	Harford	Allegheny	Sahara
	Rehabilitation	Neurosurgery & Pain	Associates of	Pain Care	Surgery Center	Consultants of	Medical Center	Spine & Sports	Outpatient	County	Pain	Outpatient
	Associates of Northern		Charleston	Center		West Florida		Medicine, PC	Surgery Center,	Ambulatory	Management,	Surgery
Objector	Michigan								LLC	Surgery	P.C.	Center, Ltd.
										Center, LLC		
IV. MOTIVE OBJECTIONS												
Q. The PSC's subpoenas are thinly-veiled												
attempts to identify new clients.	X	X				Х	X	X			X	Х

Change at clinics request

	Universal Pain	Pain Medicine	Medical	Union Hospital	Ambulatory	Sequoia Surgery	Edison	Isaiah	Comprehensiv	Box Hill	The South
	Management	Specialists, PA	Advanced		Surgery Center	Center, LLC	Surgical (in	Florence (in	e Pain	Surgery	Bend Clinic,
	Medical		Pain			f/k/a Cypress	discussions	discussions	Management	Center	LLC
Objector	Corporation		Specialists,			Surgery Center,	w/Steve	w/Steve	(in discussions		
	d/b/a Universal		P.A. ("MAPS")			LLC	Rasnick)	Rasnick)	w/Steve		
	Pain								Rasnick		
	Management										
IV. MOTIVE OBJECTIONS											
Q. The PSC's subpoenas are thinly-veiled											
attempts to identify new clients.		Х								Х	

Objector	Neurosurgical Group of Chattanooga	St. Thomas Outpatient Neurosurgical Center	Surgery Center, PLLC	Howell Allen Clinic, PLLC	Dr. Donald Jones	Southeast Michigan Surgial Hospital		Memorial	Management	North Carolina Orthopedic Clinic	Surgical Park Center, Ltd.	Surgery Center of Wilson, LLC	Forsyth Street Ambulatory Surgery Center, LLC
V. RELEVANCE													
R. The requested documents are not relevant and/or not reasonably calculated to lead to the discovery of admissable evidence.	Х	х	х	х	х	х	х	х	х	Х	Х	х	х
S. Insurance Policies (from non-parties) are non relevant and not reasonably calculated to lead to discovery of admissable evidence.	х				х	х	х		х				

	Neuromuscular and	Rochester Brain and Spine	Pain	Dr. O'Connell's	Greenspring	Pain	Ukiah Valley	Interventional	Encino	Harford	Allegheny	Sahara
	Rehabilitation	Neurosurgery & Pain	Associates of	Pain Care	Surgery Center	Consultants of	Medical Center	Spine & Sports	Outpatient	County	Pain	Outpatient
	Associates of Northern		Charleston	Center		West Florida		Medicine, PC	Surgery Center,	Ambulatory	Management,	Surgery
Objector	Michigan								LLC	Surgery	P.C.	Center, Ltd.
										Center, LLC		
V. RELEVANCE												
R. The requested documents are not relevant												
and/or not reasonably calculated to lead to the	x	x	V	V		V	v	V	v		X	V
discovery of admissable evidence.	X	X	Х	Х		Х	Х	Х	Х		X	X
S. Insurance Policies (from non-parties) are non												
relevant and not reasonably calculated to lead to	X	Х	Х			Х		X		X		
discovery of admissable evidence.												

				,		•		•			
	Universal Pain	Pain Medicine	Medical	Union Hospital	Ambulatory	Sequoia Surgery	Edison	Isaiah	Comprehensiv	Box Hill	The South
	Management	Specialists, PA	Advanced		Surgery Center	Center, LLC	Surgical (in	Florence (in	e Pain	Surgery	Bend Clinic,
	Medical		Pain			f/k/a Cypress	discussions	discussions	Management	Center	LLC
Objector	Corporation		Specialists,			Surgery Center,	w/Steve	w/Steve	(in discussions		
	d/b/a Universal		P.A. ("MAPS")			LLC	Rasnick)	Rasnick)	w/Steve		
	Pain								Rasnick		
	Management										
V. RELEVANCE											
R. The requested documents are not relevant											
and/or not reasonably calculated to lead to the	x	x	Х							Х	
discovery of admissable evidence.	^	^	^							^	
S. Insurance Policies (from non-parties) are non											
relevant and not reasonably calculated to lead to										X	
discovery of admissable evidence.											

Change at clinics request

Objector	Group of Chattanooga	Outpatient	Surgery Center, PLLC	Howell Allen Clinic, PLLC	Jones		Memorial	North Carolina Orthopedic Clinic	Wilson, LLC	Forsyth Street Ambulatory Surgery Center, LLC
VI. OTHER										
T. Subpoena was incomplete										
U. The PSC declined to confer.										

Change at clinics request

	Neuromuscular and	Rochester Brain and Spine		Dr. O'Connell's		Interventional		Harford	Allegheny	Sahara
						Spine & Sports				Outpatient
Ohioston	Associates of Northern		Charleston	Center	West Florida		= :		Management,	
Objector	Michigan							· .	P.C.	Center, Ltd.
								Center, LLC		
VI. OTHER										
T. Subpoena was incomplete										
								X		
II. The DCC declined to confer										
U. The PSC declined to confer.								×		
								~		

Change at clinics request

		Pain Medicine	Medical	Union Hospital		Sequoia Surgery			Comprehensiv	Box Hill	The South
	Management	Specialists, PA	Advanced		Surgery Center	Center, LLC	Surgical (in	Florence (in	e Pain	Surgery	Bend Clinic,
	Medical		Pain			f/k/a Cypress	discussions	discussions	Management	Center	LLC
Objector	Corporation		Specialists,			Surgery Center,	w/Steve	w/Steve	(in discussions		
	d/b/a Universal		P.A. ("MAPS")			LLC	Rasnick)	Rasnick)	w/Steve		
	Pain								Rasnick		
	Management										
VI. OTHER											
T. Subpoena was incomplete											
U. The PSC declined to confer.											